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Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

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In the Matter of Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) to Accelerate  
Investment in Broadband and Next-Generation Networks (Docket 18-141)

Dear FCC,

I am writing with regards to Category 1. I have concerns about the forbearance of mandates described in 47 U.S. Code § 251(c)(3) which were established by the Telecommunications Act of 1996. I urge the commission to reject the petition.

My business and those of many others I know rely on data and voice services provided a local competitive carrier who's offerings exceed those of the incumbent in price, quality, privacy and support. Service offerings from the ILEC are not suitable for our needs when compared to those of local competitive carriers.

Additionally, I do not believe that Unbundled Access distorts competition and investment decisions. Repealing these mandates are not required in order to spur innovation and investment by incumbent local carrier exchanges as evidenced by the monumental investments and technology upgrades rolled out by incumbent providers. AT&T's U-Verse and recent Gigabit services, Verizon Fios, and CenturyLink's purchase of Level3 Networks are a few examples of huge investments and new innovations from these companies in recent years.

Research shows that many other ILEC members of USTelecom are also investing heavily in new technology. A few examples include Frontier Communications' boasting of having "invested millions in network capital" and claims to having "deployed ROADM technology to more than 500 locations over the past 3 years", not to mention their numerous acquisitions and partnerships from 1996 through the present day. Since 2001, Great Plains Communications of Nebraska has deployed an "extensive 8,000 miles of self-healing, diverse fiber network". Pioneer Communications of Oklahoma claims their new Fiber optic network which provides fiber to the customer is currently available in 26 areas with 40 future builds planned, 13 of which are underway as of today.

If anything, Unbundled Access is pivotal to spurring innovation and investment from ILEC's by creating competition that puts pressure on them to upgrade their networks and provide access to cutting edge internet technology. Without competition, prices will remain high and there will be no imperatives to invest in new infrastructure or next generation technology.

I urge you to dismiss USTelecom's petition for forbearance from section 251(c) Unbundling and resale requirements and related obligations, and certain section 271 and 272 requirements.

Sincerely,

Drew Phillips